



OCPF Reports

From the Director

It's certainly not quiet at OCPF these days. Here are a few of the important issues we are confronting on a daily basis: Interpreting the recent Supreme Court decision, *Citizens United vs. FEC*, administering three special elections for legislative seats, working with municipal clerks on posting reports, assisting over 100 new candidates in understanding the campaign finance law, rolling out a new version of our disclosure software, Reporter 5, transferring certain municipal candidates to our jurisdiction, and, of course, implementing all of the new requirements in the new campaign finance law. I'm sure you can read about many of these matters elsewhere in this newsletter – I'll just touch on a few of them briefly.

The office has received many calls asking about the effect of the recent Supreme Court decision regarding the involvement of corporations in political campaigns. The decision, as far as the state is concerned, now means that corporations may make independent expenditures to support or oppose Massachusetts candidates. Corporations will also be required to disclose these expenditures in accordance with Section 18A of Chapter 55. Corporations **will not**, however, be allowed to make direct contributions to candidates. Candidates may not receive direct contributions from any business or

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Supreme Court decision impacts Mass. campaign finance law

Corporate contributions to candidates remain prohibited

The recent U.S. Supreme Court decision, *Citizens United v. Federal Election Commission*, has changed the landscape on corporate involvement in Massachusetts political campaigns, but does not alter the existing ban on corporate contributions to candidates.

Corporations and other business entities are still prohibited from making contributions to candidates, political parties and PACs. The court's decision, however, now allows corporations to participate in independent "express advocacy" expenditures, which are made to support or oppose candidates. For example, a corporation can now buy a newspaper advertisement asking readers to vote for a

The impact of *CU v. FEC*

Independent corporate "express advocacy" is now **allowed**, but contributions to candidates, PACs and parties are still **prohibited**

certain candidate at an election, so long as the corporation does not coordinate the ad with the candidate's campaign.

Prior to the court's decision, corporations and other businesses were prohibited from making independent expenditures.

If corporations make independent expenditures to advocate for or against candidates, they must disclose that activity by filing electronic reports with OCPF (or with municipal officials if the

expenditures concern local candidates who do not file with OCPF).

The Supreme Court decision also affects organizations with corporate funds in their general treasuries, such as non-profit groups financed by business donations. These groups are now permitted to make independent expenditures to support or oppose candidates. Prior to the court decision, those groups were prohibited from making independent expenditures.

Campaign finance reports required for specials

New law revisions are in effect for candidates

Candidates running in the three special elections this spring will each file three campaign finance reports – and will also follow the recent changes to the campaign finance law, which went into effect Jan. 1, 2010.

Candidates for the special Senate elections, to fill seats left vacant by the

resignations of former senators Scott Brown and Anthony Galluccio, are required to file pre-election reports by May 3 and a 30-day after the election report by June 10. They also filed pre-primary reports by April 5.

Candidates for the House seat left vacant by the resignation of former State Rep. William

Lantigua are required to file pre-primary reports by May 10, pre-election reports by June 7 and 30-day after reports by July 15.

These special elections will mark the first time candidates for General Court will adhere to the campaign finance law changes. Some of

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professional corporation, limited liability company, or limited liability partnership. For further clarification on this issue, please feel free to contact OCPF.

District city councilors in Boston, Springfield, and Worcester will now file their disclosure reports directly with OCPF, just as their city-wide brethren currently do. We've been working with these officials to transfer them to OCPF's depository system. Mayoral candidates in cities with populations of 40,000 to 100,000 will also file directly with OCPF in the same manner that legislative candidates do. That adds 23 cities to our client base.

Al Grimes and Tracey Dano of our IT department have been sweating out the last minute details of rolling out our new disclosure software, Reporter 5. Reporter 5 brings new functionality to the user – it allows easier migration of data and builds in a variety of new modules and safeguards designed to assist the user. I'd like to thank our many beta testers for their help and thoughtful comments.

We've updated our paper forms – now local candidates can actually complete their report on editable PDF documents available on our Web site, print them out and file them with the local clerk who will then post them (if required) on the municipal Web site. Certainly, it will be easier to view the reports than it was when they were handwritten.

Also, don't forget the weekly Wednesday seminar at 2 p.m. in our office – we've had a great response to these tutorials. I've enjoyed meeting the attendees.

Mike Sullivan

Editable PDF reports are available for local candidates

OCPF has made "editable PDF" campaign finance forms available on its Web site for municipal candidates and other local political committees.

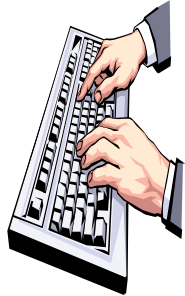
The editable forms allow candidates and treasurers to type information directly into the documents, then print and sign the forms for filing with local election officials.

Previously, municipal forms were only available on OCPF's Web site in regular PDF form, requiring users to print the document and fill in the information by pen. The editable forms

create easy-to-read copies for clerks, who are required to inspect and post all reports with more than \$1,000 in activity to their respective municipal Web sites within 30 days of a deadline.

The editable forms are available under the "Forms and Publications" tab at the OCPF Web site, www.mass.gov/ocpf. Form M102, the regular campaign finance report used by municipal candidates, PACs and ballot question committees, is available in editable form, as are other forms.

Candidates also have the option of downloading OCPF's free Reporter 5 software, which allows them to enter information into a database, and print copies of reports for filing with local election officials.



Reporting software gets upgrade

OCPF's free reporting software, **Reporter 5**, is now available.

The software can be downloaded from the OCPF Web site, www.mass.gov/ocpf.

The software can be used by all political committees.

Continued: Special Elections

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the changes include:

Sub-vendor reporting:

Candidates will be required to file sub-vendor reports if they make expenditures to vendors of \$5,000 or more, and the vendors make subsequent payments to sub-vendors of \$500 or more.

Late contributions: Campaigns will file special reports for all contributions of \$500 or more that are received and deposited within 18 days of an election. The reports must be filed within 72 hours of deposit.

Late fines: A candidate can be fined \$25 a day up to \$5,000 for late reports. The previous amount was \$10 a

day up to \$2,500.

Changes to the campaign finance law did not alter contribution limits for donors to candidates – the limit is still \$500 for the calendar year. For exam-

ple, if a person donates \$250 to a candidate for the special election, they are limited to donating another \$250 to the same candidate for the scheduled election happening this fall.

Reporting Requirements

Candidates in special legislative elections file three reports for the election cycle:

A Pre-Special Primary report, due 8 days before the special primary election and complete as of 10 days prior to the due date (18 days before the special primary).

A Pre-Special Election report, due 8 days before the special election and complete as of 10 days prior to the due date (18 days before the special election).

A Post Election report, due 30 days after the special election and complete as of 10 days prior to the due date (20 days after the special election).

Recently Organized Candidate Committees

The following candidates recently established committees with OCPF:

Brad Williams, West Roxbury, Senate, Suffolk & Norfolk, Republican, Dec. 4.

David R. Lucas, Melrose, House, 32nd Middlesex, Republican, Dec. 7.

Jason Wentworth, Dartmouth, House, 9th Bristol, Democrat, Dec. 8.

Stephen E. Spelman, East Longmeadow, District Attorney, Hampden District, Democrat, Dec. 11.

Peter J. Durant, Spencer, House, 6th Worcester, Republican, Dec., 11.

Josh Cutler, Duxbury, House, 6th Plymouth, Democrat, Dec. 11.

Charles Rudnick, Newton, Senate, 1st Middlesex & Norfolk, Democrat, Dec. 14.

Gregory Neffinger, West Springfield, House, 6th Hampden, Republican, Dec. 14.

Jerald A. Parisella, Beverly, House, 6th Essex, Democrat, Dec. 14.

Keith Nicholas, Warren, Sheriff, Worcester County, Unaffiliated, Dec. 14.

Michael Edward Lake, Boston, Auditor, Democrat, Dec. 21.

Craig Spadafora, Malden, Senate, Middlesex & Essex, Republican, Dec. 22.

Monica Medeiros, Melrose, House, 32nd Middlesex, Republican, Dec. 22.

Daniel Dubrule, Ashburnham, Senate, Worcester, Hampden, Hampshire & Franklin, Republican, Dec. 23.

John F. Keenan, Quincy, Senate, Norfolk & Plymouth, Jan. 4.

Marie Angelides, Longmeadow, House, 2nd Hampden, Republican, Jan. 4.

Michael J. Albano, Chelsea, Senate, Middlesex, Suffolk & Essex, Democrat, Jan. 7.

Michael J. Coogan, Assonet, Senate, 1st Bristol & Plymouth, Democrat, Jan. 11.

David T. Vieira, Falmouth, House, 3rd Barnstable, Republican, Jan. 12.

Oscar R. Arce, Greenfield, House, 2nd Franklin, Democrat, Jan. 13.

Christopher Dent, Nahant, Senate, 3rd Essex & Middlesex, Republican, Jan. 13.

Scot Bove, Jefferson, Sheriff, Worcester County, Democrat, Jan. 13.

Brian J. Herr, Hopkinton, State Treasurer, Republican, Jan. 13.

Enrico John Villamaino III, East Longmeadow, House, 2nd Hampden, Republican, Jan. 20.

Kelly Tynan, West Roxbury, House, 10th Suffolk, Democrat, Jan. 20.

Sal DiDomenico, Everett, Senate, Middlesex, Suffolk & Essex, Democrat, Jan. 21.

Dennis A. Benzan, Belmont, Senate, Middlesex, Suffolk & Essex, Democrat, Jan. 25.

Scott Houseman, Beverly, House, 6th Essex, Democrat, Jan. 29.

Raymond Medeiros Jr., Dartmouth, House, 9th Bristol, Democrat, Jan. 29.

Lori-Ann Turner, Framingham, House, 6th Middlesex, Republican, Feb. 2.

Paul P. Sullivan, West Roxbury, House, 10th Suffolk, Democrat, Feb. 2.

Genevieve C. Fraser, Orange, House, 2nd Franklin, Feb. 3.

Patrick Brennan, Boston, House, 4th Suffolk, Republican, Feb. 3.

John Kelly, Dracut, Senate, 2nd Essex & Middlesex, Democrat, Feb. 3.

David W. Pottier, Taunton, Senate, 1st Plymouth & Bristol, Republican,



Feb. 4.

David Rose, Fall River, House, 6th Bristol, Republican, Feb. 4.

F. Randal Hunt, East Sandwich, House, 5th Barnstable, Republican, Feb. 5.

Jonathan Loya, Holliston, House, 8th Middlesex, Feb. 5.

Jane Morriss, Groton, House, 1st Middlesex, Democrat, Feb. 8.

Daniel Winslow, Norfolk, House, 9th Norfolk, Republican, Feb. 9.

Gerald Wasserman, Needham, House, 13th Norfolk, Democrat, Feb. 10.

Joshua Levy, Needham, House, 13th Norfolk, Republican, Feb. 10.

Kristine Abrams, Easton, House, 11th Plymouth, Republican, Feb. 10.

Anthony C. Bonavita, Agawam, House, 3rd Hampden, Feb. 10.

Jennie L. Caissie, Oxford, Governor's Council, 7th District, Republican, Feb. 11.

Jacob Bombard, South Boston, House, 4th Suffolk, Democrat, Feb. 12.

Paul Mark, Pittsfield, House, 2nd Berkshire, Democrat, Feb. 12.

Kenneth O'Brien, Holden, House, 1st Worcester, Unaffiliated, Feb. 16.

Mark G. Mastroianni, Westfield, District Attorney, Hampden District, Unaffiliated, Feb. 16.

Karen L. Payne, Roslindale, House, 6th Suffolk, Democrat, Feb. 17.

James S. Connolly, Attleboro, House, 2nd Bristol, Feb. 17.

Kimberly Ferguson, Holden, House, 1st Worcester, Republican, Feb. 17.

Gary Burns McNeill, Needham, House, 13th Norfolk, Democrat, Feb. 17.

Denise Garlick, Needham, House, 13th Norfolk, Democrat, Feb. 17.

John Tobin, West Roxbury, City Council, Democrat, Feb. 19.

Thomas Bowler, Pittsfield, Sheriff, Berkshire County, Democrat, Feb. 19.

Alan Silvia, Fall River, House, 7th Bristol, Democrat, Feb. 19.

Paul Brodeur, Melrose, House, 32nd Middlesex, Democrat, Feb. 22.

Eric Estevez, Wakefield, House, 32nd Middlesex, Republican, Feb. 22.

Russell Holmes, Mattapan, House, 6th Suffolk, Democrat, Feb. 23.

Dean Vogel, West Springfield, House, 6th Hampden, Republican, Feb. 24.

Jesse Reich, Ayer, House, 1st Middlesex, Democrat, Feb. 24.

John Mitchell, Fall River, Senate, 1st Bristol & Plymouth, Democrat, Feb. 24.

Edward Coppinger, West Roxbury, House, 10th Suffolk, Democrat, Feb. 24.

James Munafo, Hyannis, House, 2nd Barnstable, Republican, Feb. 25.

Darrin D'Wayne Howell, Dorchester, House, 6th Suffolk, Democrat, Feb. 25.

Patricia Lawton, Bridgewater, House, 8th Plymouth, Democrat, Feb. 26.

Barry Lawton, Dorchester, House, 5th Suffolk, Democrat, Feb. 26.

Lee Scott Laugenour, Lenox, House, 4th Berkshire, Green-Rainbow, Feb. 26.

Michael Anderson, Georgetown, House, 2nd Essex, Republican, March 1.

Mark McGonagle, South Boston, House, 4th Suffolk, Democrat, March 1.

Mark Ciommo, Boston, City Council, March 2.

Matthew Beaton, Shrewsbury, House, 11th Worcester, Republican, March 2.

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Recent Cases and Rulings

OCPF audits all campaign finance reports and reviews all complaints alleging violations of the campaign finance law. These audits and reviews may result in enforcement actions or rulings such as public resolution letters, disposition agreements or referral to the Office of the Attorney General for further action.

A public resolution letter may be issued in instances where the office found "no reason to believe" a violation occurred: where "no further action" or investigation is warranted: or where a subject "did not comply" with the law but, in OCPF's view, the case is able to be settled in an informal fashion with an educational letter or a requirement that some corrective action be taken. A public resolution letter does not necessarily imply a wrongdoing on the part of a subject and does not require agreement by a subject.

A disposition agreement is a voluntary written agreement entered into between the subject of a review and OCPF, in which the subject agrees to take certain specific actions.

Public Resolution Letters

CPF-09-52: Rep. Demetrius J. Atsalis, West Hyannisport. Did not comply (personal use, corporate contributions, reporting); 12/22/2009. During the 2007-2008 reporting period, the Atsalis Committee did not accurately report its campaign finance activity, did not comply with a ban on committee reimbursement payments to the candidate set out in a previous public resolution letter, accepted and deposited \$900 in corporate, excess and misdirected political contributions, made expenditures that were primarily for personal use, and did not consistently comply with the interim reporting schedule established in a previous public resolution letter. The candidate and his political committee each made a

\$500 payment to the state as civil forfeitures and purged \$900 in prohibited corporate contributions to charity. The candidate agreed to forgive all past committee liabilities to himself and repay his committee \$1,500 from his personal funds for the personal use of campaign money. The candidate also agreed to an enhanced reporting schedule.

CPF-09-85: Morris Jones, Springfield. Did not comply (disclosure); 12/30/2009. The Jones Committee spent more than \$3,000 between July and November in 2009, prior to filing a Certificate of Appointment of Depository Bank form with OCPF. Jones, a candidate for City Council, was assessed a penalty of \$1,020 for the late-filing of the form. The form was filed on Nov. 23, 2009.

CPF-09-72: Police Chief William Pittman, Nantucket. No further action (public resources); 1/4/2010. The town authorized payment for the production of a video advocating a "yes vote" on a new police station. Based on the timing and content of the video, public resources should not have been used. The town paid \$800 from the police department budget for the video, which was aired on local Nantucket TV and posted on the town Web site prior to town meeting on April 4, 2009. The town election was April 12. At the conclusion of the video, the police chief encouraged the citizens of Nantucket to "vote yes for the new police facility." The chief did not specify that the appeal was for a yes vote at town meeting, and therefore, viewers could reasonably conclude the video as being intended to influence the town election. The Police Charitable Association reimbursed the town \$800.

CPF-09-101: Rep. Charles Murphy, Burlington. Did not comply (reporting); 01/11/2010. The committee

did not disclose many expenditures from 2003 to 2008, causing the committee to significantly overstate its ending balance on campaign finance reports. The review, initiated at the request of the committee, included an analysis of bank statements, supporting documentation and a reconciliation of the committees' campaign finance records. To resolve the matter, the committee amended its reports, has made a \$1,500 payment to the state for the costs of the review and has agreed to an enhanced reporting schedule.

CPF-09-87: Haverhill Democratic City Committee. Did not comply (disclosure, prohibited contributions); 01/12/2010. The committee did not file reports for 2006, 2007 or 2008 until November 2009, disclosing more than \$10,000 in activity during the three-year period. The report failed to itemize \$5,908 in contributions, and the committee accepted two prohibited contributions from candidates running for Congress. To resolve the matter, the committee made payments of \$500 to the state's general fund and \$500 to charity.

CPF-10-01: Rep. Michael Rush, West Roxbury. No further action (public employees, public buildings); 01/14/2010. Rep. Rush's Statehouse office phone number was listed on his campaign Web site as a contact number for people interested in making contributions to his campaign. Campaign finance law prohibits public employees from soliciting or receiving campaign contributions, and prohibits the solicitation or receipt of contributions in buildings used for governmental purposes. No funds were raised as a result of the phone number being listed on the Web site.

Recently Organized

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- Mike Ross**, Boston, City Council, March 2.
- John O'Leary**, Needham, House, 13th Norfolk, Republican, March 2.
- John Thorlin**, Andover, House, 18th Essex, Republican, March 2.
- Jonathan Long**, Holden, House, 1st Worcester, March 2.
- Paul Levasseur**, Acushnet, County Commissioner, Bristol County, Democrat, March 2.
- Tom Szczapaniak**, Dalton, House, 2nd Berkshire, Democrat, March 3.
- William "Bill" Linehan**, Boston, City Council, Democrat, March 3.
- William Campbell**, Woburn, Secretary of State, Republican, March 4.
- Rob Consalvo**, Hyde Park, Boston, City Council, Democrat, March 4.
- David Proulx**, Fall River, House, 8th Bristol, Republican, March 4.
- Ben Quelle**, Middleboro, House, 12th Plymouth, Republican, March 8.
- Timothy Allen**, Springfield, District City Council, March 9.
- Rich Bastien**, Gardner, House, 2nd Worcester, Republican, March 9.
- Nicholas Collins**, South Boston, House, 4th Suffolk, Democrat, March 9.
- Steven M. Glovsky**, Salem, Governor's Council, Republican, March 12.
- Thomas A. McCarthy**, Springfield, Senate, 1st Hampden & Hampshire, Republican, March 12.
- Martin A. McGuane**, House, 2nd Franklin, Democrat, March 12.
- David A. Smith**, Wareham, House, 2nd Plymouth, Democrat, March 12.
- James Henderson**, Stow, Secretary of State, un-affiliated, March 15.
- David Bissailon**, Adams, House, 1st Berkshire, Democrat, March 15.
- Sean P. Malloy**, Dorchester, House, 5th Suffolk, Republican, March 15.
- Angelo L. D'Emilia**, Bridgewater, House, 8th Plymouth, Republican, March 16.
- Corey Belanger**, Lowell, Governor's Council, Democrat, March 16.
- Paul Schmid**, Westport, House, 8th Bristol, Democrat, March 17.
- Debra Silberstein**, Andover, Senate, 2nd Essex & Middlesex, Democrat, March 18.

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Recent cases and rulings

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CPF-09-78: Angela Cheng-Cimini, Sturbridge. No reason to believe (disclosure); 01/28/2010. Angela Cheng-Cimini personally paid for a town-wide mailing in support of a ballot question, distributed prior to the Oct. 26, 2009, election in Sturbridge. The mailing, however, inadvertently contained a statement indicating it was from the "Friends of Burgess Elementary." Groups that raised or spent money to support or oppose a ballot question in 2009 were required to file disclosure reports, while individuals were not required to file. Because the mailing was paid for by an individual, filing a disclosure report was not required in 2009 (individuals are required to file disclosure reports starting in 2010).

CPF-09-77: Attorney General Martha Coakley Committee. No reason to believe (prohibited contribution); 02/04/2010. The state-level Martha Coakley Committee provided goods and services to her U.S. Senate campaign, which reimbursed the state committee \$35,735. The state-level committee then disgorged that amount to charity to comply with Massachusetts campaign finance law, which prohibits state-level committees from receiving money from federal political committees.

CPF-09-49: Essex Regional Retirement Board, Danvers. Did not comply (public resources); 02/16/2010. The Essex Regional Retirement Board used public resources to oppose Question 1 on the ballot in the Nov. 4, 2008, state election. The board reproduced and distributed approximately 5,000 copies of its fall 2008 newsletter, "The Navigator," which contained a section advocating a vote against the ballot question. A total of \$18,090 was spent for the production, reproduction and mailing of the 12-page Navigator, of which 1.5 pages were devoted to influencing the ballot question. An OCPF review determined that public resources were used to repro-

duce and distribute the newsletter and did not comply with the campaign finance law. The board's executive director, Timothy Bassett, paid \$5,000 in restitution to the board.

CPF-09-56: Sheriff Guy W. Glodis, Auburn. Did not comply (disclosure); 2/26/2010. The committee distributed a four-page Worcester County Sheriff's Annual News Bulletin, which was paid for by the Worcester County Civil Process Office, in a campaign mailing. The Glodis Committee should have made the initial payment to reproduce the News Bulletin because it was part of a campaign mailing. The committee has paid the Worcester County Civil Process Office \$674.69 for the costs of the printing.

CPF-09-94: Allison Heartquist, Newburyport. Did not comply (corporate contribution); 3/4/2010. The Heartquist Committee received a prohibited corporate contribution of \$100 from the Wharf Management Company on Sept. 29, 2009. The committee made a \$100 payment to the state to purge the contribution.

Advisory Opinions

AO-09-08: A head coach of a public school's athletic team who is employed for a season that lasts from mid-March to May, if compensated, would be a temporary public employee during that season. As such, he would not be able to engage in political fundraising during the season when he is employed. He may, however, engage in political fundraising in the off-season, even if he expects to be reappointed for the upcoming season. If the town designates the position as unpaid, however, and the coach is not compensated for his work, he would not be subject to the restrictions of M.G.L. c. 55, § 13 and could, even during the season when he works as a coach, solicit and receive contributions.

AO-09-09: A municipal official who is considering running for state legislative of-

fice, who would like to contact supporters and friends to see if he can raise at least \$100,000, which he believes would be the minimum amount necessary to be a viable candidate, must file campaign finance reports with OCPF. His outreach to friends and supporters would include verbal and written solicitations to the effect that he has worked on a number of issues of public importance as a municipal official and would like to continue this task as a legislator, and that he would run for legislative office if he can raise at least \$100,000. If funds are raised for a possible state legislative campaign, however, and the individual decides to not seek state office, the money raised may be used for the individual's campaigns for local office.

AO-10-01: The fact that the name of a partnership appears on a check given to a candidate's committee does not necessarily mean the check is from the partnership. If the check, or other writing submitted with the check, states that it was drawn on a partner's personal sub-account, the check may be used to transmit the individual partner's contribution. Business partnerships are prohibited from contributing to candidate campaigns.

AO-10-02: A candidate's committee may rent a school bus, that is personally owned by one of its supporters, at fair market value, for use at campaign events. The committee may also pay the supporter to decorate the bus with the campaign's signs and colors. The committee would then be obligated to pay the supporter, at fair market value, for the advertising benefit received from the decorated bus even on days the committee did not rent the bus for campaign events. If an individual volunteers to drive the bus at campaign events, the driver's time and work would be a "personal service" to the committee, which would not need to be disclosed on the committee's campaign finance reports.

Law student joins OCPF

Nisha Balsara, a 2nd-year Suffolk University Law School student, was hired as a part time legal intern at the Office of Campaign and Political Finance.

She is assisting the OCPF legal department in a number of capacities, including research. She is also enhancing OCPF's electronic legal search database.

Balsara, a Malden native, received her undergraduate degree in political science and economics from George Washington University.

Did you know?

Local election officials are beginning to post municipal campaign finance reports to their city or town Web sites. Clerks can post every report, but are only required to post forms that reflect \$1,000 or more in activity. The new statute requires the reports to be posted within 30 days of a filing deadline.

Local election officials are asked to keep the reports posted on their municipal Web site for at least six years (specifically, until Dec. 31 of the sixth year following the relevant election).

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